

# **EXHIBIT F**

1           UNITED STATES DISTRICT COURT  
2           SOUTHERN DISTRICT OF NEW YORK  
3           -----x  
4           DONNA WOOD, et al, individually  
5           and on behalf of all others  
6           similarly situated,  
7                       Plaintiffs,  
8           vs.               20 Civ. 2489 (LTS) (GWG)  
9           MIKE BLOOMBERG 2020, INC.,  
10                       Defendant.

11           -----x

12  
13           VIDEOTAPE DEPOSITION OF  
14                       RONALD LUIPPOLD  
15           VIA ZOOM VIDEOCONFERENCE  
16                       November 29, 2022  
17                       10:00 a.m.

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19  
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23           Reported by:  
24           Maureen Ratto, RPR, CCR  
25

1 RONALD LUIPPOLD

2 VIDEOGRAPHER: We are going  
3 back on the record at 1:30 Eastern  
4 Time.

5 Q. Mr. Luippold, was there a  
6 period of time in February or March of  
7 2020 where your health issues precluded  
8 you from being able to work for the  
9 Campaign?

10 A. Towards the end of the  
11 Campaign, yes.

12 Q. What health issues were you  
13 experiencing toward the end of the  
14 Campaign?

15 A. Nausea, a lot of pain and, you  
16 know, it was debilitating neck pain, back  
17 pain, all stuff that was caused by my  
18 previous injuries, I guess.

19 Q. And when did you start  
20 experiencing this debilitating pain?

21 A. I don't know exactly when this  
22 happened. It was just right around the  
23 time I got back from the debate in Las  
24 Vegas, so it was probably the week after.

25 Q. And at the point when you had

1 RONALD LUIPPOLD

2 this onset of pain, were you performing  
3 any work for the Campaign or did you stop  
4 working altogether at that point?

5 A. No. I was still making phone  
6 calls and I was doing stuff from home at  
7 that point.

8 Q. Were there periods during the  
9 day where you were unable to work because  
10 of your debilitating pain?

11 A. Yes.

12 Q. Now, approximately how many  
13 hours per day were you working during  
14 this period of time, at the end of  
15 February?

16 A. At that point I might have  
17 been reduced to about six hours a day  
18 versus the 12 that I had been performing  
19 prior to that.

20 Q. Was there any period of time  
21 where you were unable to perform any work  
22 at all during your employment with the  
23 Campaign?

24 A. A couple days, yeah, when I  
25 was in the hospital, when I was at the

1 RONALD LUIPPOLD

2 hospital.

3 Q. And when were you in the  
4 hospital?

5 A. It was March, it was towards  
6 the end of the Campaign I believe. Maybe  
7 -- yeah, I think it was in March.

8 Q. And how many days did you  
9 spend in the hospital?

10 A. I don't recall. It was  
11 definitely an extended period of time. I  
12 don't know exactly how long. It brought  
13 me into the spring months.

14 Q. More than a month?

15 A. Yes.

16 Q. While you were still in the  
17 hospital were you still being paid by the  
18 Campaign?

19 A. I don't recall.

20 Q. And were you admitted to the  
21 hospital due to the issues that you just  
22 described, nausea and debilitating neck  
23 and back pain?

24 A. Yeah. Nausea was just a  
25 side-effect. I really went for the

1 RONALD LUIPPOLD

2 debilitating back/neck pain. I was  
3 getting to the point where I couldn't  
4 move.

5 Q. Had you been experiencing the  
6 neck and back pain? Like, had it been  
7 increasing over time prior to the point  
8 where you were hospitalized or was it  
9 more of a sudden onset?

10 A. I don't recall. You know, to  
11 be honest with you, I think it was the  
12 plane ride back from Vegas I started  
13 really having problems at that point. I  
14 noticed it coming on more and more.

15 Q. Did you have to have surgery  
16 at some point in 2020 due to these  
17 issues?

18 A. I don't think so. I was just  
19 in a brace for an extended period of  
20 time, six to eight weeks, I think.

21 Q. During your employment with  
22 the Campaign did you have to attend  
23 doctors' appointments related to the  
24 issues that you've testified about today?

25 A. Not that I recall.

1 RONALD LUIPPOLD

2 A. Yes.

3 Q. And then do you see  
4 immediately above that there is a  
5 response from you that says, "That sounds  
6 great, Albert. It's in my schedule. I  
7 will see you there was with all the  
8 materials that you will need. Thank you  
9 for your support."

10 A. Yes.

11 Q. And is it still your testimony  
12 that you never wound up going to this  
13 house party?

14 A. That's correct.

15 Q. Why did you not wind up not  
16 actually attending?

17 A. As I recall, I was -- some  
18 changes were being made in my district  
19 and so I think either Ross Doty or Julian  
20 -- I'm sorry, I want to say Julian --  
21 Jacob Edelman attended with someone like  
22 Ed Davis was there. I felt like they had  
23 more experience to have someone whose got  
24 more campaign experience there, I guess.

25 Q. The date of the house party

1 RONALD LUIPPOLD

2 that's mentioned in Mr. Bangert's email  
3 of February 26th, was this the period of  
4 time when you were in the hospital?

5 A. It might have been when it  
6 started.

7 Q. And if you were in the  
8 hospital then you wouldn't have been able  
9 to attend the event; is that correct?

10 A. That's -- that's correct.

11 Q. Did you attend the DNC debate?

12 A. I did.

13 Q. And you were selected by the  
14 Campaign to attend the debate, correct?

15 A. Yes.

16 Q. What, if anything, do you know  
17 about why you personally were selected to  
18 attend the debate?

19 A. It's my understanding it was  
20 just a random pull from a hat.

21 Q. And you were in Las Vegas for  
22 a period of less than 24 hours, correct?

23 A. Yes.

24 Q. And other than attending the  
25 debate, itself, did you engage in any



1 RONALD LUIPPOLD

2 Q. And that was in February?

3 A. Late February.

4 Q. And when you became ill, how  
5 many days per week were you working then?

6 A. I believe I was still working  
7 every day until I could no longer. I  
8 mean, I was working minimal hours, six  
9 hours a day, if I recall, until I just  
10 couldn't handle it anymore when I got in  
11 the hospital.

12 Q. And what was the date when you  
13 were hospitalized?

14 A. I don't recall that date.

15 Q. Do you have any records  
16 regarding your hospitalization?

17 A. Not on me. I'm sure there are  
18 records somewhere.

19 Q. Other than at the end when you  
20 became ill, were there any weeks in which  
21 you worked fewer than seven days?

22 A. No.

23 Q. As a field organizer did you  
24 have any involvement in selling Campaign  
25 merchandise?